

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIANE DENMARK,

Civil Action No. 04-12261-DPW

Plaintiff

v.

LIBERTY MUTUAL ASSURANCE
COMPANY OF BOSTON, THE GENRAD,
INC. LONG TERM DISABILITY PLAN,
THROUGH TERADYNE, INC., AS
SUCCESSOR FIDUCIARY

Defendants

**PLAINTIFF'S MOTION TO COMPLETE RECORD ON REVIEW
WITH RULE 7.1 CERTIFICATION**

NOW COMES the plaintiff, Diane Denmark ("Ms. Denmark"), pursuant to Rule 7(b) of F.R.C.P., Rule 7.1 of the local rules of this Court, moving this Court to enter an order permitting the plaintiff to complete the record on review by adding information produced by defendant Liberty Life Assurance Company of Boston pursuant to an order of this Court. In further support of this motion, plaintiff has filed a memorandum of law herewith and the declaration of Jonathan M. Feigenbaum verifying those discovery materials which are attached to his declaration.

The memorandum and materials are being filed under seal in accordance with a stipulated confidentiality order entered by this Court on April 26, 2005, requiring filing such materials under seal.

RULE 7.1 CERTIFICATION

Plaintiff's counsel certifies that he conferred with attorney Richard Patterniti who represents the defendants in this matter, before filing this motion, and was advised that the defendants would oppose this motion.

WHEREFORE, plaintiff prays that this motion be allowed.

DIANE DENMARK

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party of record (mail) on 5/22/05